

1 EDMUND G. BROWN JR.
Attorney General of the State of California
2 DAVID S. CHANEY
Senior Assistant Attorney General
3 FRANCES T. GRUNDER
Chief Assistant Attorney General
4 THOMAS S. PATTERSON
Supervising Deputy Attorney General
5 VIRGINIA I. PAPAN, State Bar No. 143659
Deputy Attorney General
6 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
7 Telephone: (415) 703-5956
Fax: (415) 703-5843
8 Email: Gina.Papan@doj.ca.gov

Jerry D. Rothman
State Bar No. 226686
LAW OFFICE OF JERRY D. ROTHMAN
16633 Ventura Boulevard, Suite 1400
Encino, CA 91436
Telephone: (818) 528-7780
Fax: (818) 990-6302
E-mail: jrothman@helpulegal.com

Attorney for Plaintiff Amelia Euceda

9 Attorneys for Defendants Maureen McLean and
Richard Kirkland

10
11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 **AMELIA EUCEDA,**
16 **as an individual Successor in interest to**
Jesus Noe Maldonado, decedent,
17 **Plaintiff,**
18 **v.**
19 **PELICAN BAY STATE PRISON,**
20 **RICHARD KIRKLAND, WARDEN AND**
MAUREEN McCLEAN,
21 **Defendants.**

C 06-1411 PJH

**STIPULATION TO CONTINUE
DISCOVERY CUTOFF DATES**

AND ORDER

Judge: The Honorable Phyllis J. Hamilton

22
23 THE PARTIES THROUGH THEIR UNDERSIGNED COUNSEL, STIPULATE AND
24 AGREE AS FOLLOWS:

25 Trial in this matter is currently scheduled to begin on October 22, 2007, and the Court
26 ordered that the parties disclose experts on February 15, 2007. Originally, the expert discovery
27 cutoff was set for March 19, 2007, and the non-expert discovery cutoff was set for March 19,
28 2007.

Stipulation to Continue Discovery Cutoffs

Euceda v. Kirkland, et al.
C 06-1411 PJH

1 Previously, the parties agreed and were granted a continuance of the above referenced
2 discovery dates. The dates for disclosure of expert witnesses were continued until March 23,
3 2007, and the expert discovery cutoff and the non-expert discovery cutoff dates were continued
4 until April 23, 2007.

5 The parties have again agreed to continue of the above-referenced discovery dates for
6 thirty-five days, in order to allow the parties additional time to evaluate their cases and explore
7 the possibility of a settlement agreement or dispositive motions.

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

9 (1) A continuance of the deadlines for non-expert discovery, expert disclosure, and
10 depositions of expert witnesses is in the best interests of the parties;

11 (2) Subject to further agreement by the parties or order of this Court, the date for
12 disclosure of expert witnesses is continued until April 27, 2007, followed by mutually agreeable
13 deposition dates. Additionally, the expert discovery cutoff dates are continued until May 28,
14 2007.

15 Dated: March 23, 2007

16 EDMUND G. BROWN JR.
17 Attorney General of the State of California

18 By: /s/ Virginia I. Papan
19 VIRGINIA I. PAPAN
20 Deputy Attorney General
Attorneys for Defendants
Maureen McLean and Richard Kirkland

21 Dated: March 23, 2007

22 LAW OFFICE OF JERRY D. ROTHMAN
23 Jerry D. Rothman

24 By: /s/ Jerry D. Rothman
25 JERRY D. ROTHMAN
Attorney for Plaintiff Amelia Euceda

26 IT IS SO ORDERED.

27 Dated: 3/26/07

28 Hon. Phyllis J. Hamilton
District Court Judge



Stipulation to Continue Discovery Cutoffs

Euceda v. Kirkland, et al.
C 06-1411 PJH

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **Amelia Euceda v. Richard Kirkland, et al.**

No.: **C 06-1411 PJH**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **March 23, 2007**, I served the attached

STIPULATION TO CONTINUE DISCOVERY CUTOFF DATES

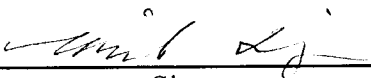
by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Jerry D. Rothman, Esq.
Law Office of Jerry D. Rothman
16633 Ventura Boulevard, Suite 1400
Encino, CA 91436
Attorney for Amelia Euceda

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on **March 23, 2007**, at San Francisco, California.

M. Xiang

Declarant



Signature